

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

PECOS RIVER TALC LLC,

Plaintiff,

-v-

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDOX,

Defendants.

Civil Action No. 4:24-cv-00075-JKW-RJK

**PECOS RIVER TALC LLC'S MOTION TO COMPEL
THE IDENTITIES OF THE ARTICLE'S SUBJECTS
AND FOR AN AMENDED ANSWER**

Pursuant to Federal Rules of Civil Procedure 8, 15, 26, and 37, Plaintiff Pecos River Talc LLC moves the Court to compel Defendants to provide the identities of the individuals in the Article and to file an amended answer within 14 days admitting or denying whether Pecos River Talc LLC has accurately identified the six individuals discussed in its complaint. The reasons and authority for this Motion are set forth with particularity in the accompanying Memorandum.

Pursuant to Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37(E), the undersigned counsel certifies that counsel for Pecos River Talc LLC conferred in good faith with opposing counsel before filing this motion.

Dated: April 22, 2025

Respectfully submitted,

/s/ Benjamin L. Hatch

MCGUIREWOODS LLP

Benjamin L. Hatch (VSB No. 70116)
Sylvia Macon Kastens (VSB No. 92375)
World Trade Center
101 West Main Street, Suite 9000
Norfolk, VA 23510-1655
Telephone: (757) 640-3727
Facsimile: (757) 640-3947
bhatch@mcguirewoods.com
skastens@mcguirewoods.com

Samuel L. Tarry, Jr. (VSB No. 36850)
1750 Tysons Boulevard, Suite 1800
Tysons, VA 22102-4215
Telephone: (703) 712 5000
Facsimile: (703) 712 5050
starry@mcguirewoods.com

KING & SPALDING LLP

Kristen Fournier
Matthew Bush
1185 Avenue of the Americas 34th Floor
New York, NY 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
kfournier@kslaw.com
mbush@kslaw.com

Counsel for Pecos River Talc LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

/s/ Benjamin L. Hatch
Benjamin L. Hatch (VSB No. 70116)